

I am opposed to this petition and believe that it is necessary to retain the Morse Code testing requirement within the Amateur Radio Service (ARS). The Morse/CW mode is the most practical, effective, efficient, and universal mode of electronic communication known to man. It permits reliable, basic communications using the least technology and the lowest amount of electrical power, and for the amount of power expended, offers a very high signal-to-noise ratio and a signal quality which permits reception even under the poorest operating conditions. It is the ultimate backup system, to be used at times when other modes of electronic communication may be compromised by poor propagation conditions or conditions of austere station configuration, i.e. low-levels of electrical power and makeshift antenna configurations. It does not require the support of any electronic device, such as a personal computer, to generate or receive the message. The "software," as it were, exists within the operator's brain -- if he or she has been trained in the use of the Morse code.

For decades, there has been heated debate on whether or not to reduce or eliminate Morse code testing requirements within the ARS. In the recent history of the ARS, we have seen first the elimination of the previous 5 WPM code testing requirement for a Technician-class license, then the lowering of the overall requirement for any license class to 5 WPM. While testing at this level may infer that the successful test taker may have a working knowledge of the Morse code, this is not the case in actual operational conditions. A testing speed level sufficient to give an Amateur Radio Operator the ability to actually communicate effectively over the air would be at least 13 WPM, since it is at this speed where the brain stops hearing individual "dits and dahs" and starts hearing actual letters, characters, and words. While 5 WPM may be a typical starting point where an operator can begin to use the Morse code on the air, it is at 13 WPM where he becomes able to comfortably pass message traffic.

I propose that the present Element 1 (a) 5 WPM Morse code test be retained for the General class license. In addition, the Element 1 (b) 13 WPM Morse code test should be re-instated for radio amateurs desiring to upgrade to the Amateur Extra class. This is a generous compromise between the need to get more prospective radio amateurs involved in the High Frequency (1.8 to 29.7 MHz) bands, and to create a cadre of radio amateurs who are still able to effectively employ the Morse/CW mode and therefore exploit the many benefits and advantages of this particular mode. Since the present privileges assigned to the General class offers the ability to use the majority of HF amateur radio privileges, this change would not impose any hardship upon potential ARS licensees.

In order to achieve the ability to pass the 5 WPM code test, all that is required is basic character recognition ability. Experience in the ARS has shown that with a bit of actual operational practice, 13 WPM is easily achieved even by persons with fairly severe physical challenges. Indeed, the Handi-Hams organization in Minnesota uses the Morse code in order to permit persons with significant communicative challenges, up to and including total deafness, to become active radio amateurs.

It is my opinion that the NCVEC Petition does not take into account

the demonstrated capability of people from virtually all walks of life to be able to learn and utilize the Morse/CW mode. In reality, all it is doing is making an attempt to simplify licensing requirements in a manner which is not needed in the ARS. My proposal offers an acceptable compromise while retaining a testing level which continues to offer the incentive of increased operator privileges.

Respectfully Submitted,

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